

## Response to Section 20 submissions

### Notice of Intention to carry out Works Where a Public Notice is NOT required

Response from the Southern Housing Group Building Safety Team to comments received in response to the Section 20 letter dated 31<sup>st</sup> March 2021, providing notification of the intention to carry out building safety surveys across many of our buildings as part of our Building Safety Programme to ensure they meet current government building safety guidelines.

In this letter, we set out details of the work that may be required in your building during this part of the programme, and invited residents to submit their comments on the proposals, as well as nominate any contractor or consultant that they felt should be approached to tender to complete this work.

The consultation period for comments and questions ended on 11 May 2021 and we received a number of comments and questions across all of our properties. Many of these were similar in nature, and so where there are similarities, these have been collated and responded to as one.

### General Questions

Is this notice just for the survey? It is not clear that it is. I understand you hope to start in July 2021, but when will that part of the task be completed?

Under FAQ Page 1, "How long does the work take", it refers to "entire phase 2 contract". What is the phase 2 contract? Is it the survey, or the works required following the survey - it is not clear at all. Please clarify.

This notice only applies to the survey and investigation review of the buildings in the Phase 2 programme and contract. Once the contract has been agreed, a programme of attendance will be produced that will allow the Group to provide a provisional date to leaseholders when the surveys will take place in your building. We will only be able to complete this once we have finished the tender process and the next stage of consultation.

Any prior notice should be sent to residents via email as well as letter. As outlined above, your letter took over week to reach me from the date it was written. In addition to proper written notice, emails reminders should be sent out 48 hours before the works are about to commence. A great deal of residents are working from home and need to be able to make arrangements to continue working when disruption is imminent.

We have taken this on board, and in the future, where we have email details for residents, communications will be sent out via email. Residents should ensure that we have an up to date address registered with the Group.

### Costs

It is absolutely vital that estimates are provided as early as possible, and at each step of the consultation process, not totalled up after months of residents being left in limbo and caused undue stress because of a lack of clarity. SHG has a duty to make this process as clear and concise as possible.

We agree with you. At this stage of the consultation, we do not have full estimates available, particularly not on a building-by-building basis. As the process moves forward, we will communicate all costs with residents so that everyone is fully aware of the details.

We want to ask how you will ensure that costs are itemised effectively, and would also like confirmation that this will be on a block-by-block, floor-by-floor basis. Anything less than this level of detail will not be acceptable to us when there is a chance costs could be passed to leaseholders. Please can you explain how you intend to provide us with this information and within what timeframe?

All costs and proposed timelines will be made available to leaseholders as soon as we have them. We will work with each building to provide accurate information which details the costs accrued by each block, and their individual property.

I know people who have their flats with different housing associations and they haven't been charged for these surveys. Therefore I would like to find out why we would have to pay for this surveys? Why for example, this survey is not covered by our Service Charge?

All costs associated with your building will be added to your building's service charge account. At the end of the year the service charge account will be reviewed to determine if there are any service charge adjustments required. In short, the cost of these surveys may already be covered in your current service charge payments. If not, you will be notified of any additional costs at the end of the financial year during the annual service charge review.

It seems that you are describing structural work to be carried out. I do not see any mention of engaging with the insurers. Can you specify if this has been done, if you have received the approval and can you confirm that the insurance policy will not be voided? I would have expected this to be written in the letter.

There are no structural works being completed as part of this programme of surveys. We will be reviewing the buildings structure, but this is to ensure there are suitable and sufficient compartmentation walls between communal areas and flats, and between flat to flat where required.

Taking all those works into consideration and our building being 3 storeys high I would like to ask what necessary steps have been done to protect leaseholders from financial ruin when the outcome of the Fire Risk Assessment will come back.

We will seek government funding and pursue claims against responsible third parties where we can.

We are doing our best to complete our building safety programme at pace and carry out this work safely. If you are in hardship because of the timing of the programme for your building please speak to us. We

want to support our residents and recognise that this is stressful time for many. There may be other options that we can discuss with you that could help.

**In the letter, you have indicated minimum costs. Please can you also indicate the maximum costs?**

Until we have received full tenders from consultants to complete the work, we cannot provide any estimation of costs. This will often depend on the work required at your individual building.

**How will these charges be communicated to potential buyers if you are listing your flat for sale under shared ownership?**

We can provide an estimated cost for the surveys and investigation if requested by the residents. This cost would only be estimated and could change depending on the level of survey and investigation required for each building.

We cannot provide any costs of any potential remedial works as a result of the survey and investigations. This will need to be communicated individually to each block as the Group become aware of any remedial work requirements.

**We note that the NHBC have accepted claims for cladding and other remediation costs for buildings within the 10 year guarantee (for example, at New Capital Quay complex in Greenwich). Given the age of some estates, will SHG be treating these as an urgent priority to ensure a claim can be made before expiration of the guarantee. Please can you provide details as to how SHG plans to ensure a claim will be made in time?**

We are aware of the NHBC process. If remedial works are required as a result of the surveys and investigation, we will review this as part of the remedial works project.

**What share of any remediation costs will SHG pay?**

This depends on the tenure of the building. When major works are carried out on blocks owned by social landlords there is no additional cost to be met by secure and assured tenants, therefore Southern Housing Group will be covering this proportion of total costs accrued where buildings house social rented tenants as well as leaseholders. Some social landlords have sought to recover the proportion of the cost of associated fire safety works for rented properties from their leaseholders – Southern Housing Group is not one of those landlords.

**When will the Notice of Proposal, setting out the estimated cost of the Building and fire safety works contract be sent out? Will it include the estimated costs are for my property specifically?**

The Notice of Estimates will be sent out to all residents once we have full proposals from the nominated and other selected contractors who have been invited to tender for the work. At this stage, the estimates will not be broken down by individual building, but once a contractor has been appointed, we will make this breakdown available to residents as soon as possible.

What is SHG doing to lobby the government to cover costs for leaseholders put in an invidious position of potentially crippling costs for something that is none of their doing, having bought their property in good faith from a reputable housing association?

Together with our colleagues at the G15, a group of the largest housing associations in London, we are calling on the government to step in and provide clear guidance for both building owners and mortgage lenders on the proportionate implementation of their building safety advice notes.

Our hope is that this will reassure residents, encourage mortgage lenders to take a more considered view, and give building owners a reasonable and realistic timeframe in which to follow government advice.

If leaseholders do have to make a contribution towards any costs that are not recoverable from the NHBC, government, contractors, consultants how will these be calculated?

If these costs do need to be met by leaseholders, then these will be calculated on a block-by-block basis.

Will that also include the houses on a development?

Individual houses on a development do not require this kind of assessment as they are classed as a "single private dwelling".

Assuming leaseholders do have to make a contribution towards any costs not recoverable from government, contractors, consultants, etc, what costs will leaseholders be liable for? Surveys? Replacement materials? Scaffolding? All works?

This notice only applies to the surveys and investigations. These costs will be added your service charge account to review at the next annual service charge review.

If works are required as a result of these surveys and investigation, we will contact each block individually with any further information.

I require your written assurance that there will be no blanket assessment / costings of the buildings. Each individual block of must have its own separate assessment and costings, and each individual leaseholder must be fully informed about what are individual flat costings, and what are communal area costings.

All work required on every building will be broken down so that all residents have a clear idea of what costs are allocated where, and how these have been allocated across all areas of a building or development.

I am shocked that SHG considers that I should pay for the survey and linked works. It is my view that SHG should not pass on the costs of the survey or any linked works to me. I bought this flat from SHG as the freeholder in good faith and I had a reasonable expectation as a buyer that as a housing developer SHG had assessed the building work competently and as safe.

The building safety world has shifted enormously since the Grenfell Tower tragedy in 2016. Your home may have been approved as safe at the time it was built, and with no issues for years, but changes in

legislation and industry guidance now mean that extra steps need to be followed and new ways of assessing buildings have come into force.

Southern Housing Group is a charitable housing association and the way we are run and how we spend our money is regulated by the government. What this means in practice is that if we cannot find an alternative source of reimbursement for the costs of the remedial work then we have no choice but to seek to recover costs under the terms of your leases. This is because the way we spend our money is subject to strict rules and we are not permitted to write off these costs if there is an alternative option. This is never our preferred way forward and we understand that this may be concerning for leaseholders. We hope that this will not be necessary but it would be wrong not to be clear about the possibility at this stage.

## Third party claims

It worries me highly that there is no mention of seeking third party for the costs involved, why is this not the case. Could you elaborate?

Does SHG undertake to pursue contractors who are at fault if / as soon as any defects are found?

On the assumption that there are some defects found in the surveys, what action are SHG going to be taking against the original consultants, contractors, suppliers, etc for them to pay in full for the rectification of those defects?

I assume that as the buildings already have a fire certificate, signed off by the Fire Officer, the contractor, consultants & the council's Building Control Officer, then any defects found in the buildings, such as lack of fire breaks between flats & floors, will be as a result of negligence on their collective part. If so, why are leaseholders being asked to pay for the remediation costs of any faults that may be found in the surveys? Surely the contractors, consultants, etc should be required to put right any defects at their own expense, not at the leaseholders expense?

Could you clarify why I would have to pay for anything that might not be compliant under an order prior to the building being built?

We will do all we can to protect leaseholders from these costs by seeking to recover them from those responsible for any building defects, or from the government, if at all possible. We always investigate the potential to claim these costs from a third party where this option is available to us.

Southern Housing Group also has buildings insurance cover which I would have thought they could make a claim against if defects are found in the surveys.

SHG should also be making a claim against the NHBC warranty for any defects found as a result of the survey. Our block is still within the 10 year NHBC warranty period.

Where we are able to pursue claims against warranties and insurance policies, we promise we will do this.

## Reserve Funds

I understand there is a substantial amount of reserve funds being held that we have paid into over the years as part of our monthly service charge. I would like to express my preference for the reserve funds to be used in the event of any cost to us that is in addition to our usual monthly service charge.

I realise you cannot predict the final cost of the assessment but I would like to know why the final amount cannot be met by the Service Charge Reserve Fund?

I believe that this Fire Risk Assessment falls within the category of “emergency repairs and cyclical works” so should be paid for out of the reserve fund rather than asking us all to pay even more, over and above the annual maintenance fees which has accrued that amount.

I would like to know why costs do not come out of the reserve fund we all pay into on a monthly basis.

My concern is the cost of the works to be carried out and I believe this money should be taken out of this block's Reserve Fund.

My concern around the works is that the cost is likely to cause me some financial hard ship and I feel strongly that the cost should come out of the residents maintenance fund.

If the cost is not to be come out of this fund then I am left feeling confused as to what this maintenance fund is actually there for? My thoughts is that it is there for any unforeseen emergency and this unexpected situation to me is an that unforeseen emergency.

The reserve, or “sink” fund is made up of money collected to cover the cost of future large planned individual items of expenditure such as a new roof, or replacement windows. The fund is not in place to cover emergency or unexpected works such as the ones being undertaken here. The Reserve needs to be protected to fund expected works and using the reserve funds for the fire safety works would leave the fund unable to meet the future obligations to repair the blocks.

All survey and investigation costs with your building will be added to your building's service charge account. At the end of the year the service charge account will be reviewed to determine if there are any service charge adjustments required. In short, the cost of these surveys may already be covered in your current service charge payments. If not, you will be notified of any additional costs at the end of the financial year during the annual service charge review.

## Legal Requirements

We want to understand what legal requirement there is to subject our block to an intrusive external wall survey and a type 4 fire risk assessment. As the block is only four storeys and is made of masonry should this not be exempt from the requirement - especially as the fire risk is, by the governments own admission, limited? Please can you point to which part (please state clause and subclause) of the government guidance note that says an intrusive fire safety survey

### is required for a block of our size?

We are reviewing each block in line with the updated RICS guidance to determine what the external wall materials are and if further investigation is required to produce an EWS1 form and/or complete any remediation works to the building. Where an EWS1 form is not required our consultant will provide a report confirming the reasons.

Our approach to building safety is risk based and we will only be completing remedial works where we need to meet our legal requirement and/or where we are required to reduce the risk to residents under the Regulatory Reform (Fire Safety) Order 2005.

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### Are you applying regulations for high rise blocks to low rise blocks & is this really appropriate?

Is this expensive fire risk assessment really necessary if the building is considered not to need an EWS1 form due to its height and the minimal nature of the cladding? The blanket approach seems not to take the most up to date RICS guidance into account and will come at a cost to everyone in the building.

Like all housing associations in the UK, over the coming years we're going to be carrying out extensive building safety surveys across many of our properties as part of our ongoing Building Safety Programme. We need to carry out building safety surveys across many of our to ensure they meet current government building safety guidelines.

If your building is under 18m tall (about six storeys) it may not require an EWS1 form. The government advice does not require that an EWS1 form is completed for all buildings, but all buildings must comply with government's building safety guidance.

Since the latest government advice was issued, some mortgage lenders have been asking for EWS1 form certification on any building they are asked to lend on, even if it is under 18m or six storeys tall. This is affecting leaseholders who wish to sell, staircase or re-mortgage their homes in low-rise blocks and are unable to.

As the section 20 consultation has not yet been completed we want to understand why intrusive survey work has already begun on some blocks. It is your legal responsibility to consult with us prior to any work being carried out that could cost over £250 per leaseholder. As we have no sight of proposed costs, we can only assume that this will be over £250 per leaseholder and therefore you appear to be in contravention of the section 20 regulations. I would like to understand on what basis you have the right to begin these works before the end of the consultation.

In some properties, the need to undertake these intrusive works has been classed as 'urgent'. As the works were urgent we had to take action before we could complete the full Section 20 process. Under the terms of the Landlord & Tenant Act, 1985, landlords have dispensation to do this, and carry out the Section 20 process retrospectively. Due to the nature of the works required, the decision was taken to undertake them as quickly as possible, using this dispensation.

Could you clarify the regulatory reform you are talking about - you state this is an order from 2005.

The Regulatory Reform (Fire Safety) Order 2005 was a piece of legislation which placed responsibility on an organisation to carry out risk assessments to identify, manage and reduce the risk of fire with in their premises.

The Fire Safety Act 2021, which amends the Fire Safety Order 2005, was passed in May, and has been designed to “ensure that people feel safe in their homes, and a tragedy like the Grenfell Tower fire never happens again”.

The Home Office has set out clarification to who is accountable for reducing the risk of fires – the duty-holder/building owner for multi-occupied, residential buildings. The Act states that they must manage the risk of fire for the structure and external walls of the building.

Will the External Wall Survey be in accordance with the latest RICS guidance, effective 5 April 2021?

Yes, all work will be in accordance with the latest RICS guidance. It is important to note that the current version, effective 5 April 2021, is likely to be updated in future. We will of course, adhere to any changes in this guidance, or additional government legislation, as it happens.

What certificate will the estate get after works - ESW1 or another alternative? If other to an EWS1, will it satisfy lenders for purposes of sale, re-mortgage or letting?

At the end of this what certificate will the estate get, as I thought ESW1 forms only applied to blocks over 18 metres in height? This is pertinent given our estate is under that height? Will the certificate satisfy lenders if & when leaseholders want to remortgage, sell or relet their properties?

The latest RICS guidance was updated on 5 April 2021. This requires each building to be assessed to determine if an EWS1 form is required. If it is confirmed that an EWS1 form is required then an EWS Survey will be carried out. Please note that our consultants will only produce the EWS1 form if the building achieves an A1, A2 or B1 rating. Where a building achieves a B2 rating requiring the building to have remedial works we will contact individual buildings. An EWS1 form will not be provided until the remedial works have been completed. A EWS1 form with a B2 rating will not help potential buyers or residents re-mortgaging their properties.

Will you ensure that this survey will be acceptable to all mortgage companies?

We will ensure that all relevant guidance and legislation is adhered to when undertaking these surveys. However, we have no power as to what individual lenders may accept when assessing a property.

## Scope of Works



We have concerns regarding the scope of the intrusive wall survey. The survey as we understand it should be used to only identify the construction materials of the wall in the first instance. I want to understand if any additional checks will be made i.e regarding fire breaks and if so, under what grounds are you required to carry this out in blocks that are only four storeys? Again, please state which guidance you are following including the clause and subclause where appropriate. We also want to state upfront that we would only give consideration to remedial works to the minimum legal/compliance requirement and nothing further.

We are reviewing each block in line with the updated RICS guidance to determine what the external wall materials are and if further investigation is required to produce an EWS1 form and/or complete any remediation works to the building. Fire breaks will be checked if the building requires an EWS1 form

Our approach to building safety is risk based and we will only be completing remedial works where we need to meet our legal requirement and/or where we are required to reduce the risk to residents under the Regulatory Reform (Fire Safety) Order 2005.

The letter mentions the possible need to retrospectively fit sprinklers, would this be for individual flats or just the communal areas?

The initial notice of intention covered all works that could be considered in order to ensure that buildings comply with current legislation. Until the Fire Risk Assessments are completed, we cannot advise as to what work will be required in a particular building, and what that work would entail.

Could you kindly provide the Notice of Estimates? If this is not available yet, please advise when I can expect to receive this.

The Notice of Estimates will be available to all residents once the tender process has been completed, and a contractor has been appointed. This forms the next stage of consultation.

Will the work be determined by the respective contractors or by an independent body such as independent fire safety assessment company?

The contractor appointed to undertake the assessments will be a specialist, independent fire safety assessor, experienced in this kind of Fire Risk Assessment exercise. They will draw conclusions on each building and provide us with written recommendations as to what action should, if required, be taken to ensure the building meets all safety requirements. This fire assessor will not be responsible for completing any required works. This work would be completed by a different contractor.

Could you provide me with a rough estimate to put up the mobile scaffold? The reason I am asking for these is purely to reduce the cost. If in future, scaffolding works are required, I thought that these works could be combined and reduce the cost

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We cannot ask our consultants or contractors to use leaseholder erected mobile scaffolds. The duty of health and safety is on our consultant and contractor and they will need to provide the relevant safe access for their staff.

As there is no mention of cladding in this letter, are you confirming no cladding remediation work is required or will you be doing the necessary survey work to understand this?

The EWS survey proposed in the Notice of Intention will give us all the information we need in regards to the composition of the external wall at a property. We would expect this to confirm whether cladding material is present and whether this material is of a risk.

We would like to know what to expect within our block, will it be loud, will you need to come into our home (by appointment), what the working hours per day will be. Will we lose any services just as intercoms, electricity etc?

What exactly will be carried out in my building and when this will be?

Until we have appointed a contractor to undertake this work, and have a programme of works from them, we are unable to advise residents on what they can expect. However, as soon as we have this information, we will ensure that residents are fully informed as to the activity that is taking place at their property. We are mindful that as people continue to work from home, additional noise can be distracting and inconvenient, and would give residents as much notice as we can of any potential noise or loss of power.

When will we know the results of these initial surveys and whether the buildings require an EWS1 or only an expert report?

Once the initial surveys have been carried out, each building will follow one of three routes. The first will be a building that does not require an EWS1 form and residents will be able to obtain a copy of our report to confirm this. The second is that your building has achieved an A1, A2 or B1 rating and our consultant will produce an EWS1 form for you to use when re-mortgaging or selling your property. The third is that your building has received a B2 rating and requires further remediation. In the third scenario, you will receive an EWS1 form, but only once we have completed the remedial works.

Further guidance to the EWS1 ratings can be found on the [RICS website](#).

## Quality Assurance & Transparency

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I want to know how Southern intend to ensure that contractors are actually carrying out what they are billing for.

Once contractors are appointed, Southern Housing Group will nominate a Project Manager from within the Group for your building. This Manager will be responsible for checking the work that is completed, ensuring the quality is of an acceptable standard, and that project timelines and budgets are being kept to.

It is unclear how you will define which works are necessary for my building. How can I therefore

be assured that the works are not over extensive and/or are required to be done?

Once we have the Fire Risk Assessment for your building, this will be fully assessed against current legislation and RICS guidance to ensure that everything that has been proposed is a required element.

Will the surveyors appointed use their critical judgement on assessing any fire risks found, rather than taking the easy way out & saying the worst case applies because their professional indemnity insurance will be at risk?

We would expect our assessors to use their professional knowledge and experience to give a true account on what they see as required to bring a building in line with current legislation. We will have regular contact with them to discuss their findings, and if there are any concerns about the level of work required, we would look to seek full clarification to ensure that residents are not asked to pay more than would be absolutely necessary.

For a EWS1, only a Chartered Surveyor with the Institute of Fire Engineers (or equivalent) can carry out the survey because of the level of judgement required. So will SHG be doing this in their initial surveys? What qualifications will the surveyors conducting assessments have?

What is the qualification of people SHG will use to do initial surveys?

We will only be accepting consultants to tender for the works who have the relevant qualifications, experience and insurance to complete an External Wall Survey. Each consultancy will be providing their level of skills, experience and training as part of the tender process.

We ask SHG to ensure transparency, accountability and dialogue during this process. SHG should make decision-makers available for public meetings for all residents.

SHG needs to hold in-person consultation meetings with residents and SHG representatives so that information / concerns can be verbally exchanged. The COVID restrictions will hopefully soon be lifted to allow this to happen, and if they are not, online meetings via Zoom etc. can be held.

You are absolutely right to seek transparency and accountability throughout this process, and we want to help you get as much information as you need, in a way that works for you.

We are keen to speak with as many residents as we can during the process of making your buildings as safe as we can. We know that you will need access to timelines and cost information, and that throughout any work that will need to be undertaken, you will have questions and want your voices heard. You should expect nothing less.

As work progresses, much of the information you will get from us will be in the form of email or postal updates, letting you know what the current situation is, and what is due to happen next. However, there will be times when only a conversation will do, and at various points during this project, we will invite you to meetings with our project team where you can have your questions answered directly by the people undertaking the work and managing the project. We are still, sadly, somewhat hampered by in-person restrictions, but during the last year, we have held a number of successful and informative meetings with residents via electronic means. We hope to continue meeting with residents either in person or virtually,

and you can be assured that when we reach the appropriate time for your building, this will happen for you too.

## Available information

You write that as part of the fire risk assessment the Group will be expecting external wall materials, which will help to assess building materials used. Our block of flats was built in 2015 and surely the materials used must be known to SHG. Please can you comment?

Surely SHG should have floor plans, evacuation plans etc as part of the build and sign off? Why do we need to pay for these to be carried out?

Under FAQ Page 1, items 3, 4 & 5, hasn't the original contractor & consultants already got a set of floor plans for each building, schedule of materials used & taken photographs of the block as it was being constructed? As Built drawings & Materials used, etc.

Certainly you must have floors plan available for each block/floor and list of the building materials used in the construction of the block. If not, please explain why not.

Some of the information required for the assessment, such as the building materials used in the construction would be easily obtainable from the constructor and the architect. Why would we need to pay to obtain this information? Similarly, the floor plans for each block could be supplied by the architect or construction company as the building was nominated and won several housing awards when it was built much of this information is in the public domain.

You are correct that much of the information that will be required to undertake this work will be easily available, either from the Group's records, or from third parties. However, it is important to understand that this consultation document is required to cover every possible eventuality across hundreds of properties. In some cases, due to the age of a property, or perhaps the constructor/architect no longer being in business, some paperwork may not be available, and will need to be traced. This may have a cost implication.

## Fire Risk Assessments

Why, if there is an existing fire assessment for my block that is fully competent, does there need to be another one? Does this mean the existing fire assessment is not fully competent?

How can we be clear that this new fire survey SHG is proposing will be an improvement or tell us more than the first?

Your consultation document says that as part of SHG's forthcoming assessment it is reviewing the internal structure of buildings for adequate compartmentation. This is a vital feature for building fire safety. Why did SHG not assess for adequate compartmentation when SHG signed off my building as complete by the builders Taylor Wimpey in 2007/2008? Why was adequate compartmentation not considered as part of the existing fire assessment?

I am concerned that the need for the new fire assessments SHG are consulting on and any linked works are down to failures by SHG to conduct previous fire assessments competently. Therefore SHG should bear the cost.

Apart from the intrusive surveys, surely all other items included in the description of work should have been included in the original Fire Risk Assessment already/routinely carried out for the estate?

Again, it is important to stress that the letter you have received covers off every eventuality that may be faced across all of the Group's buildings. We need to make sure that you are aware of all of the work that "may" be required to assess your property, and that this does not mean it "will" be required. Where we have existing evidence that will assist the assessors, we will provide this to them.

Fire Risk Assessments (FRAs) are categorised into four types depending on the level of detail and intrusive inspection works that must be carried out. Your building will have already have one of Types 1-3 as detailed below, and this shows that your building is safe. All of our existing FRAs have been completed competently, and all are valid. They are just not enough for us to guarantee that we meet current legislation, particularly given the post-Grenfell tragedy focus on what a building is made from.

The survey work we are proposing under the terms of this Section 20 notice is to carry out a Type 4 assessment, which is the most detailed.

### Type 1

This is the basic assessment that mainly tests the common non-destructive parts of the communal parts of a building. Type 1 FRAs are undertaken to meet the requirements of the Fire Safety Order. This type of assessments practically reviews the arrangements that the fire engineers made for people living within the building to escape if there was a fire. Some entry and exit points of the doors to the flats are also inspected during this assessment.

Type 1 FRAs are the inspections our in-house Fire Risk Assessors undertake within the common areas of the buildings owned and managed by Southern Housing Group.

### Type 2

This assessment is similar to a Type 1 Fire Risk Assessment, in that it relates to the protection of the common parts of the building. A Type 2 inspection additionally involves a degree of intrusive exposure of the building and therefore usually requires the presence of a contractor to open up construction and make good after the inspection.

### Type 3

This type of inspection is like the Type 1 assessment with a slightly wider scope. Type 3 is a non-intrusive assessment but goes beyond the scope of the Fire Safety Order by considering the fire precautions of a building, such as the means of escape and fire detection within a sample of flats.

## Type 4

The most comprehensive Fire Risk Assessment is the Type 4 assessment. Whilst a Type 4 Fire Risk Assessment covers the same areas as the Type 3 FRA, a Type 4 also undertakes intrusive inspections within the common parts of the building and in a sample of the flats and therefore usually requires the presence of a contractor to open up construction and make good after the inspection.

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